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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NET INNOVATE INTERNATIONAL PTE. LTD. 19 Kallang Avenue, #06-159 Singapore 339410

Plaintiff,

CIVIL ACTION NO.

vs.

DATAQ INTERNET EQUIPMENT CORPORATION 530 S. Henderson Road King of Prussia, PA 19406

18

1264

and

UNITE HARDWARE, LLC d/b/a DATAQDIRECT 530 S. Henderson Road King of Prussia, PA 19406

Defendant.

COMPLAINT

PARTIES



- 1. Plaintiff Net Innovate International Pte. Ltd. ("Net Innovate") is a private limited company with a principal place of business as captioned.
 - 2. Net Innovate is a citizen of Singapore.
- 3. Defendant DataQ Internet Equipment Corporation ("DataQ") is a Pennsylvania corporation with a principal place of business as captioned.
 - 4. DataQ is a citizen of the United States of America.
- 5. Defendant Unite Hardware, LLC d/b/a DataQDirect ("DataQDirect") is, upon information and belief, a Pennsylvania limited liability company with a principal place of business as captioned.

6. DataQDirect is a citizen of the United States of America.

JURISDICTION & VENUE

- 7. This Honorable Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship among the parties and the amount in controversy is in excess of \$75,000.00.
- 8. Venue in this Honorable Court is proper because DataQ has a principal place of business within this judicial district.

FACTS

- 9. Plaintiff incorporates the foregoing paragraphs as though fully set forth at length herein.
- 10. Plaintiff specializes in the sale and distribution of I/T networking equipment (the "Equipment") to customers in Singapore, Europe, and the United States.
 - 11. In or around September 2015 Plaintiff began supplying Equipment to Defendants.
- 12. From September 2015 through approximately February 2018, Plaintiff has supplied Defendants with approximately \$3,500,000.00 worth of Equipment.
- 13. Defendants DataQ and DataQDirect are, upon information and belief, related entities controlled by the same principals.
- 14. Upon information and belief, the principals of Defendants DataQ and DataQDirect use those entities interchangeably.
- 15. On or about July 12, 2017, Defendants issued Purchase Order No. 11836 to Plaintiff (the "July 2017 PO").

- 16. A true and correct copy of the July 2017 PO is attached hereto and made a part hereof as Exhibit "A."
- 17. Pursuant to the July 2017 PO, Defendants purchased \$103,724.06 worth of Equipment from Plaintiff.
- 18. The Equipment purchased pursuant to the July 2017 PO was delivered to Defendants on July 24, 2017.
- 19. At the time Defendants issued the July 2017 PO, Defendants were significantly behind in payments to Plaintiff.
- 20. As such, Plaintiff agreed to provide the Equipment ordered in the July 2017 PO to Defendants on a "consignment" basis whereby Defendants were required to provide Plaintiff with a sales report every two weeks along with a payment for the associated Equipment.
- 21. After 90 days from the date of delivery (or October 24, 2017), Defendants were required to either (a) return all unsold Equipment to Plaintiff; or (b) negotiate a discount on the unsold Equipment and then pay the discounted sum of Plaintiff.
- 22. Defendants failed to return any unsold Equipment to Plaintiff on or before October 24, 2017.
- 23. The sum of \$20,000.00 remains due and owing for Equipment provided to Defendants pursuant to the July 2017 PO.
- 24. On or about November 2, 2017, Defendants issued Purchase Order No. 12013 to Plaintiff (the "November 2017 PO").
- 25. A true and correct copy of the November 2017 PO is attached hereto and made a part hereof as Exhibit "B."

- 26. Pursuant to the November 2017 PO, Defendants purchased \$125,534.70 worth of Equipment from Plaintiff.
- 27. The Equipment purchased pursuant to the November 2017 PO was delivered to Defendants on November 14, 2017.
- 28. The terms and conditions of payment for the November 2017 PO were the same as for the July 2017 PO.
- 29. As such, Defendants were required to provide Plaintiff with a sales report every two weeks along with a payment for the associated Equipment.
- 30. Defendants did not provide Plaintiff with any sales reports relative to the November2017 PO.
- 31. After 90 days from the date of delivery (or February 13, 2018), Defendants were required to either (a) return all unsold Equipment to Plaintiff; or (b) negotiate a discount on the unsold Equipment and then pay the discounted sum of Plaintiff.
 - 32. Defendants failed to return any unsold Equipment.
 - 33. Defendants have not made a single payment toward the November 2017 PO.
- 34. To date, Defendants owe Plaintiff the total sum of \$145,534.70 (the "Outstanding Balance").
- 35. On February 27, 2018, Plaintiff demanded that Defendants pay the Outstanding Balance to Plaintiffs.
- 36. A true and correct copy of the February 27, 2018 demand letter is attached hereto and made a part hereof as Exhibit "C."
- 37. Despite demand, Defendants have failed and refused to pay the Outstanding Balance to Plaintiff.

COUNT I - BREACH OF CONTRACT

- 38. Plaintiff incorporates the foregoing paragraphs as though fully set forth at length herein.
- 39. Each of the Purchase Orders constitutes a binding contract between Plaintiff and Defendants.
- 40. As set forth above, pursuant to the Purchase Orders, Defendants agreed to pay Plaintiff for the Equipment set forth in the Purchase Orders.
- 41. As set forth above, Defendants breached the agreement by, among other things, failing and refusing to pay amounts due and owing to Plaintiff and failing and refusing to return unsold Equipment to Plaintiff.
 - 42. As a result of Defendants' breaches of the agreement, Plaintiff has been damaged.

WHEREFORE, Plaintiff Net Innovate International Pte. Ltd. demands judgment in its favor and against Defendants DataQ Internet Equipment Corporation and Unite Hardware, LLC d/b/a DataQDirect, jointly and severally, in the sum of \$145,534.70 plus prejudgment interest, post-judgment interest, costs, and any other relief this Honorable Court deems just and proper.

COUNT II - UNJUST ENRICHMENT

- 43. Plaintiff incorporates the foregoing paragraphs as though fully set forth at length herein.
- 44. Defendants received a benefit from Plaintiff in the form of delivery of the Equipment.
- 45. It would be unjust for Defendants to retain those benefits as Defendants did not pay Plaintiff the agreed-upon prices for the Equipment.

WHEREFORE, Plaintiff Net Innovate International Pte. Ltd. demands judgment in its favor and against Defendants DataQ Internet Equipment Corporation and Unite Hardware, LLC d/b/a DataQDirect, jointly and severally, in the sum of \$145,534.70 plus prejudgment interest, post-judgment interest, costs, and any other relief this Honorable Court deems just and proper.

LUNDY, BELDECOS & MILBY, P.C.

Date: <u>3/20/2018</u>

JESSICA M. GULASH, ESQUIRE

PA ID #208463

By:

450 N. Narberth Avenue, Suite 200 Narberth, PA 19072

(610) 668-0772 jgulash@lbmlaw.com

Attorney for Plaintiff

Exhibit "A"

Suite A King Of Prussia, PA 19406-4211

Data Direct

Purchase Order

Pate P.O. No. 7/12/2017 11836

Phone # (610) 354-9070 Fax # (610) 354-9852

purchasingteam@dataqdirect.com www.DataQDirect.com

Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581 Ship To

Seth Krawitz
DataQDirect
530 South Henderson Road
Suite A
King Of Prussia PA 19406

Buyer SK

	FOB	Product Type	Payment Method	1	Must Ship By	Expected ETA	Ship Via
Commence of the Commence of th	Origin	Cisco	NET 90		7/19/2017	7/26/2017	Will Call

Item	Description	Qty	Rate	Rcv'd	Amount
AIR-PWRINJ5=	POWER INJECTOR (802.3AF) FOR AP 1600, 2600 AND 3600 W/O MOD	30	25.74	0	772.20
ASA5506-WALL-MNT	WALL MOUNT FOR ASA 5506	5	30.00	0	150.00
ASA5512-FPWR-K9	ASA 5512-X WITH FIREPOWER SERVICES, 6GE, AC, 3DES/AES, SSD	3	1,288.50	0	3,865.50
CAB-STACK-50CM=	CISCO STACKWISE 50CM STACKING CABLE	28	11.00	0	308.00
CISCO2901-SEC/K9	2901 ROUTER WITH 2 GE, 4 EHWIC, 2 DSP, 256MB CF, 512 DRAM, IP BASE WITH SECURITY LICENSE PAK	2	875.16 and a state of the state	O	1,750.32
CISCO2901-V/K9	2901 ROUTER WITH VOICE BUNDLE (PVDM3-16, UC LICENSE PAK, FL-CUBE10) 2 GE, 4 EHWIC, 2 DSP, 256MB CF, 512 DRAM, IP BASE	2	831.25	0	1,662.50
CISCO2911/K9	2911 ROUTER WITH 3 GE, 4 EHWIC, 2 DSP, 1 SM 256MB CF, 512 DRAM, IP BASE	4	823.26	.0.	3,293.04
CISCO2901-V/K9	2901 ROUTER WITH VOICE BUNDLE (PVDM3-16, UC LICENSE PAK, FL-CUBE10) 2 GE, 4 EHWIC, 2 DSP, 256MB CF, 512 DRAM, IP BASE	2	1,068.51	0	2,137.02
CP-PWR-CUBE-3=	IP PHONE POWER TRANSFORMER FOR THE 7900 PHONE SERIES	40	13.50	0	540.00
EHWIC-D-BESG	8 PORT ETHERNET SWITCH INTERFACE CARD	5	207.00	0	1,035.00
GLC-TE	1000BASE-T SFP EXTENDED TEMPERATURE RANGE	40	82.95	(0)	3,318.00
ISR4331/K9	ISR 4331, 2GE, 2NIM, 1SM, 4G FLASH, 4G DRAM, IP BASE	2	990.00	0	1,980.00
ISR4331/K9	ISR 4331, 2GE, 2NIM, 1SM, 4G FLASH, 4G DRAM, IP BASE	1	956.57	O.	956.57
NIM-4FXO	4-port Network Interface Module - FXO (Universal)	3	345.00	0	1,035.00

Suite A King Of Prussia, PA 19406-4211

Data Direct

Purchase Order

7/12/2017	11836
Date	P.O. No.

Phone # (610) 354-9070

(610) 354-9852 w

purchasingteam@dataqdirect.com www.DataQDirect.com

Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581

Fax#

Seth Krawitz
DataQDirect
530 South Henderson Road
Suite A
King Of Prussia PA 19406

Buyer SK

Service Services	FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via	200000000000000000000000000000000000000
Servence	Origin	Cisco	NET 90	7/19/2017	7/26/2017	Will Call	in english strangers

Item	Description	Qty	Rate	Rov'd	Amount
PWR-1941-POE	CISCO 1941 AC POWER SUPPLY WITH POWER OVER ETHERNET	2	71.23	0	142.46
PWR-2911-POE	CISCO 2911 AC POWER SUPPLY WITH POWER OVER ETHERNET	2	122,11	0	244.22
PWR-3900-AC=	CISCO 3925/3945 AC POWER SUPPLY		142,47	. 0	569.88
PWR/IEI70W-PC-AC	IE family power supply 170W. AC to DC	11	495.00	0 1	495.00
SRW248G4-K9-NA	SF300-048 48-PORT 10/100 MANAGED SWITCH WITH GB UPLINKS	2	198.12	0	396.24
STACK-TI-IM	1M TYPE 1 STACKING CABLE SPARE FOR 3850 SWITCH	10	61.06	0,	610.60
WS-G2950+24TC-L	LAN BASE, 24 PORT, 2 DUAL MODE UPLINKS, NO FLEX STACK STACKING	10	381.62	(0)	3,816.20
WS-C2960CG-8TC-L	CAT 2960C SWCH 8 GE 1X DUAL UPLINK LAN BASE	15	371,43	0	5,571.45
WS-C2950X-24PO-L	LAN BASE, 24 PORT, 2 SFP+ UPLINKS, 370W POE, OPTIONAL FLEX STACK-PLUS STACKING	6	1,261.85	0	7,571.10
WS-C2960X-48FPO-L	LAN BASE, 48 PORT, 2 SFP+ UPLINKS, 740W POE, OPTIONAL FLEX STACK-PLUS STACKING	2 - La	1,758.90	0	3,517.80
WS-C2960X-48TD-L	LAN BASE, 48 PORT, 2 SFP+ UPLINKS, OPTIONAL FLEX STACK-PLUS STACKING	3	1,479.63	0	4,438.89
WS-C3560C-12PC-S	CAT 3560C SWCH 12 FE POE 2 X DUAL UPLINK IP BASE	8	580.00	0 1	4,640.00
WS-C3560C-8PC-5	CAT 3560C SWCH 8 FE POE 2 X DUAL UPLINK IP BASE	20	480.00	.0	9,600.00
WS-C3560CG-8TC-S	CAT 3560C SWCH 8 GE 2 X DUAL UPLINK IP BASE	10	448,50	0	4,485.00
WS-C3580CPD-8PT-S	CAT 3560C PD PSE SWCH 8 GE POE 2 X 1G IP BASE	8	487.50	0	3,900.00
WS-C3550CX-12PD-S	CISCO CATALYST 3560-CX 12 PORT POE, 10G UPLINKS IP BASE	2	694.55		1,389,10

Suite A Data Direct

King Of Prussia, PA 19406-4211

Purchase Order

P.O. No. Date 7/12/2017 11836

Phone # (610) 354-9070 Fax# (610) 354-9852 purchasingteam@dataqdirect.com

www.DataQDirect.com

Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581

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Ship To	
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Seth Krawitz	
DataQDirect	
530 South Henderson Road	
Suite A	
King Of Prussia PA 19406	
	A MANAGEMENT CONTRACTOR
Buyer SK	

FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via
Origin	Cisco	NET 90	7/19/2017	7/26/2017	Will Call

Item	Description	Qty	Rate	Rcv'd	Amount
WS-C3560CX-8PC-S	CISCO CATALYST 3560-CX 8 PORT POE	20	508,50	0	10,170.00
WS-C3560CX-81C-S	CISCO CATALYST 3560-CX 8 PORT DATA	20	419.05	0	8,381.00
WS-C3650-48TD-L	LAN BASE, 48 PORT, 2X10G ETHERNET W/ SFP+ UPLINKS, 250W DEFAULT POWER NO AVAILABLE POE POWER	The second and an arrange of the second and arrange of the second arrange of the second and arrange of the second arrange of the second and arrange of the second ar	1,976.00	0	1,976.00
WS-C3650-48TQ-S	IP BASE, 48 PORT, 4X10G ETHERNET W/ SFP+ UPLINKS, 250W DEFAULT POWER NO AVAILABLE POE POWER		2,900.23	0	2,900.23
WS-C3850-48F-L	LAN BASE, 48 POE+PORT, 4X1GE AND 2X10GE UPLINKS, 1100W DEFAULT PWR 800 AVAILABLE POE POWER, W/ STACK POWER	2	3,052.87	O	6,105.74
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Suite A King Of Prussia, PA 19406-4211



Purchase Order

	Date P.C), No.	
7/12/2017 11836	//12/2017 11	1836	20

Phone # (610) 354-9070

Fax # (610) 354-9852

purchasingteam@dataqdirect.com

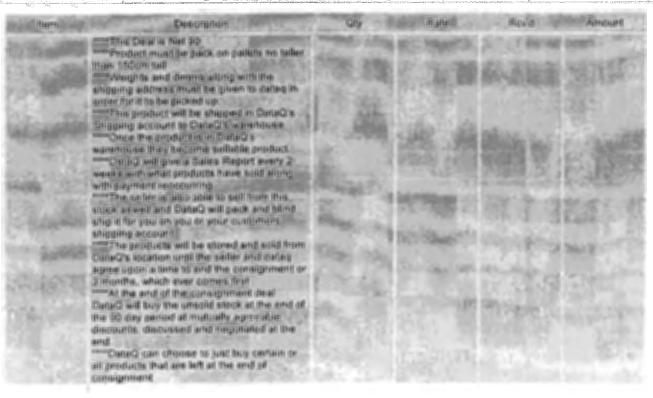
www.DataQDirect.com

Vendor

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Ship To	
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Seth Krawitz	
DataQDirect	
530 South Henderson Road	
Suite A	
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King Of Prussia PA 19406	
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Buyer SK	ģ.
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FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via
Origin	Císco	NET 90	7/19/2017	7/26/2017	Will Call





Suite A King Of Prussia, PA 19406-4211

Purchase Order

P.O. No. Date 7/12/2017 11836

(610) 354-9070 Phone #

Fax# (610) 354-9852 purchasingteam@dataqdirect.com www,DataQDirect.com

Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581

Ship To Seth Krawitz

DataQDirect 530 South Henderson Road

Suite A King Of Prussia PA 19406

SK Buyer

Payment Method Must Ship By Expected ETA Ship Via FOB Product Type **NET 90** 7/19/2017 7/26/2017 Will Call Cisco Origin

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	HAVE THE CORRECT DECLARED VALUE		\$	11 AMO	
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	DAY AFTER THIS DATE WILL RESULT IN				
	AN EXTENSION OF NET TERMS AT				
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	****THE BOXES MUST BE IN RETAIL				
	CONDITION, CLEAN WITH NO HAND				
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Data Direct

Suite A King Of Prussia, PA 19406-4211

Purchase Order

7/12/2017	11836	
Date	P.O. No.	

Phone # (610) 354-9070 Fax#

(610) 354-9852

purchasingteam@dataqdirect.com www.DataQDirect.com

Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581

Ship To Seth Krawitz DataQDirect 530 South Henderson Road Suite A King Of Prussia PA 19406 SK Buyer

FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via
The state of the s					
Origin	Cisco	NET 90	7/19/2017	7/26/2017	Will Call

Item	Description	Qty	Rate	Rcv'd	Amount
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	****THE PRODUCT MUST HAVE BEEN	1			
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	YEAR BEFORE THE PURCHASE DATE ON	, was		and the same of th	
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	MOST UP TO DATE SOFTWARE ****BOX DATES ARE NOT TO BE EARLIER	1			
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	****BOX DATES ARE NOT TO BE LONGER				
1988	THEN 30 DAYS AFTER THE				
132	MANUFACTURING PART DATE ****SHIPMENT MUST BE SHIPPED WITH				
	THE HTS CODE 8517.62.0050 UNLESS			000000000000000000000000000000000000000	
100	STATED OTHERWISE BY DATAQ				
	"PO IS TO SHIP TOGETHER IN FULL AS		1	,	
	ONE SHIPMENT UNLESS OTHERWISE			100000	
122	STATED BY DATAQ		1	1.00	
	""ALL PRODUCTS ARE TO BE 100% REAL ORIGINAL GENUINE TO THE			692 Switz	
5-0-25	MANUFACTURE STATED IN THIS PO, NO			(
533	JPGRADES OR FAKES WILL BE				
	ACCEPTED BY DATAQ		\$ 5		
	""IF ANY OF THE ABOVE CONDITIONS			denove	
	ARE NOT MET DATAQ HAS THE RIGHT TO				
	CANCEL THIS PO/PAYMENT OR RETURN ANY PRODUCT AT ANY POINT			5.000	
	ALL CREDIT CARD, SALES TAX AND			noodinaan	
- C	REIGHT CHARGES ADDED TO INVOICE				
			· · · · · · · · · · · · · · · · · · ·		

Dala Direct

Suite A King Of Prussia, PA 19406-4211

Purchase Order

Date P.O. No. 7/12/2017 11836

Phone # (610) 354-9070

Fax # (610) 354-9852

purchasingteam@dataqdirect.com

www.DataQDirect.com

Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581 Ship To

Seth Krawitz
DataQDirect
530 South Henderson Road
Suite A
King Of Prussia PA 19406

Buyer SK

FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via
Origin	Cisco	NET 90	7/19/2017	7/26/2017	- Will Call

Item	Description	Qty	Rate	Rcv'd	Amount
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	TRIBUTION CHANNEL ORIGIN OF THE				
	DUCT. IN ADDITION THE PRODUCT			on of the control of	
IS E	LIGIBLE FOR FUTURE AFTER SALES				

Suite A King Of Prussi

Suite A King Of Prussia, PA 19406-4211

Purchase Order

Date P.O. No. 11836

Phone # (610) 354-9070

Fax # (610) 354-9852

purchasingteam@dataqdirect.com www.DataQDirect.com

Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581 Ship To

Seth Krawitz

DataQDirect
530 South Henderson Road
Suite A
King Of Prussia PA 19406

Buyer SK

FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via
Origin	Cisco	NET 90	7/19/2017	7/26/2017	Will Call

Item	Description	Oty	Rate	Royd	Amoun
	PROGRAMS SUCH AS SMARTNET/JCARE.			No. of the second	, Ash
	YEAR IF THE PRODUCT IS NOT ABLE TO			and the second s	
	BE COVERED UNDER AN AFTER SALES			- Andrews	
	SERVICE CONTRACT, SELLER AGREES		West of the Contract of the Co		
	TO TAKE PRODUCT BACK FOR A FULL				
	REFUND AND PAY ALL COSTS		ki ana ana ana ana ana ana ana ana ana an	to de la constante de la const	
	ASSOCIATED WITH THIS PROCESS:		annocation.	and the state of t	
	5. FOR CIF/LANDED SALES: DATAQ IS NOT RESPONSIBLE FOR ANY		PO COCOCO AND		
	IMPORTATION, INSURANCE AND/OR		Chaban	70	
	TRANSPORTATION COSTS AND IS NOT		00000	-	
	THE LEGAL IMPORTER OF THIS		1.	and the second	
	PRODUCT. ANY AND ALL LIABILITIES	,		9	
	FOR THE IMPORTATION OF THE				
	PRODUCT ARE FOR THE SELLER'S			9	
	ACCOUNT, 6 SELLER UNDERSTANDS THAT SHOULD			generalasi	
	THE BUYER BELIEVE A BREACH IN THE			V-P-P-P-P-P-P-P-P-P-P-P-P-P-P-P-P-P-P-P	
	ABOVE HAS OCCURRED, THAT ANY			SON PARAMETER STATE OF THE STAT	
	PAYMENTS DUE ON THE PRODUCTS OR	ş	<u> </u>	D*************************************	
	OTHER RELATED TRANSACTIONS MAYBE			*000	
	WITHHELD IN THE FUTURE UNTIL THE	-			
	ABOVE REPRESENTATIONS HAVE BEEN CURED TO THE FULL SATISFACTORY OF	3			
	THE BUYER.				
	7. FOR ALL SHIPMENT THAT ARE HELD				
	BY CUSTOMS FOR ANY REASON AT ALL			8	
	WILL RESULT IN EXTENSION OF NET			80074	
	TERMS BEGINNING FROM THE DATE			0,000	
	SHIPMENT IS RECEIVED BY DATAQ.			A. V. W.	
				1	

Dala Direct

Suite A King Of Prussia, PA 19406-4211

Purchase Order

Date	P.O. No.
7/12/2017	11836

Phone # (610) 354-9070

Fax # (610) 354-9852

purchasingteam@dataqdirect.com

www.DataQDirect.com

Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581 Sch Krawitz
DataQDirect
530 South Henderson Road
Suite A
King Of Prussia PA 19406

Buyer SK

Work own or	FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via
- 50	Origin	Císco	NET 90	7/19/2017	7/26/2017	Will Call

	Item	Description	.0	Qty	Rate	Rev'd	Amount
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					Total		\$103,724.06

NOTE: Seller represents and warrants that the goods are authentic and lawfully obtained. Seller further represents and warrants that the goods were manufactured by the manufacturer indicated by the part number or description on this PO. Seller hereby submits to any background checks deemed necessary by Buyer. Seller represents and warrants that the Goods are new in the manufacturer's original scaled retail packaging and unregistered from any service contract unless specifically agreed to otherwise in writing by Buyer. Seller will include all necessary, American power cords, with each product shipped where applicable.

Exhibit "B"

530 South Henderson Rd Suite A Data Direct King Of Prussia, PA 19406-4211

Purchase Order

P.O. No. Date 11/2/2017 12013

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Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581

Fax#

Ship To

Seth Krawitz DataQDirect 530 South Henderson Road Suite A

Buyer

King Of Prussia PA 19406

SK

Payment Method Must Ship By Expected ETA Ship Via FOB Product Type Will Call NET 90 11/9/2017 11/16/2017 Origin Cisco

Item	Description	Qty	Rate	Rcv'd	Amount
AIR-CT2504-15-K9	2500 SERIES WIRELESS CONTROLLER 4 PORTS W/15 ACCESS POINT LICENSE	3	745.00	0	2,235.00
AIR-CT2504-RMNT=	RACKMOUNT FOR 2500 SERIES WIRELESS CONTROLLER	100	25,00	0	2,500.00
CISCO1941W-A/K9	1900 SERIES WIRELESS (802.11 A/B/G/N FCC COMPLIANT WLAN ISM) ROUTER WITH 2 GE, 2 EHWIC SLOTS, 256MB CF, 512MB DRAM, IP BASE	O	350.00	Company of the design of the second of the s	3,150.00
CISCO2951-SEC/K9	2951 ROUTER WITH 3 GE, 4 EHWIC, 3 DSP, 2 SM 256MB CF, 512 DRAM, IP BASE WITH SECURITY LICENSE PAK	1	1,300.00	0	1,300.00
CISCO2951-V/K9	2951 ROUTER WITH VOICE BUNDLE (PVDM3-32, UC LICENSE PAK, FL-CUBE10) 3 GE, 4 EHWIC, 3 DSP, 2 SM 256MB CF, 512 DRAM, IP BASE	The state of the s	1,500.00	0	1,500.00
CP-PWR-CUBE-3=	IP PHONE POWER TRANSFORMER FOR THE 7900 PHONE SERIES	114	13.00	0	1,482.00
CVR-QSFP-SFP10G	QSFP to SFP10G adapter	10	100,00	0	1,000.00
CVR-X2-SFP10G=	X2 TO SFP+ ADAPTOR MODULE	30	40.00	0.*	1,200,00
IE-3000-4TC-E	IE 3000 4-PORT BASE SWITCH W/ LAYER	1	950.00	0	950.00
IE-4000-4GC4GP4G-E	IE 4000 4 x combo 1G with 4 x 1G PoE, 4 x 1G Combo , LAN Bas	1 10	1,500.00	**************************************	1,500.00
PWR-4430-AC	Cisco 4431 AC Power Supply (Secondary PS) 4430	2	270.00	0	540.00
PWR-C45-1300ACV	CATALYST 4500 1300W AC POWER SUPPLY (DATA AND POE)	2.	200.00		400.00
PWR-C45-2800ACV=	CATALYST 4500 2800W AC POWER SUPPLY (DATA AND POE)	1	399.00	0	399.00
PWR-IE170W-PC-AC	IE family power supply 170W. AC to DC	10	465.00	0	4,650.00
SF300-24PP-K9-NA	SF300-24PP 24-PORT 10/100 POE+ MANAGED SWITCH WITH GIG UPLINKS	96	210.00	0	20,160.00

530 South Henderson Rd Suite A Contract King Of Prussia, PA 19406-4211

Purchase Order

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Vendor

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Seth Krawitz
DataQDirect
530 South Henderson Road

Suite A
King Of Prussia PA 19406

Buyer

SK

,	FØB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via	Section Control
	Origin	Cisco	NET 90	11/9/2017	11/16/2017	Will Call	

Item	Description	Qty	Rate	Rcv'd	Amount
SRW248G4 K9-NA	SF300-048 48-PORT 10/100 MANAGED SWITCH WITH GB UPLINKS	9	198.00	0	1,782.00
WS-C2960CG-8TC-L	CAT 2960C SWCH 8 GE 1X DUAL UPLINK LAN BASE	5	315.00	0	1,575.00
MS-C2960X-24PO-L	LAN BASE, 24 PORT, 2 SFP+ UPLINKS, 370W POE OPTIONAL FLEX STACK-PLUS STACKING	1,4	1,225.00	0	17,150.00
WS-C2960X-24TS-L	LAN BASE, 24 PORT, 4 SFP UPLINKS, OPTIONAL FLEX STACK STACKING	29	598.00	0	17,342.00
WS-C2960X-48FPS-L	LAN BASE, 48 PORT, 4 SFP+ UPLINKS, 740W POE, OPTIONAL FLEX STACK-PLUS STACKING	2	1,780.65	0	3,561.30
WS-C2960X-48LPS-L	LAN BASE, 48 PORT, 4 SFP+ UPLINKS, 370W POE, OPTIONAL FLEX STACK-PLUS STACKING	3	1,342.80	0	4,028.40
WS-C2960X-48TS-L	LAN BASE, 48 PORT, 4 SFP+ UPLINKS, OPTIONAL FLEX STACK-PLUS STACKING	21	950.00		19,950,00
WS-C2960X-48TS-LL	LAN LITE, 48 PORT, 2 SFP+ UPLINKS, NO FLEX STACK-PLUS STACKING	3	800.00	O	2,400.00
NS-C3560C-8PC-S	CAT 3560C SWCH 8 FE POE 2 X DUAL UPLINK IP BASE	4	470.00	0	1,880.00
WS-C3650-48FWS-S	Cisco - WS-C3650-48FWS-S - Cisco Catalyst 3650-48F Layer 3 Switch - 48 Ports - Manageable - 48 x POE+ - Stack	1	1,500.00	Q.	1,500.00
NS-(C3850-24T-S	IP BASE, 24 PORT, 4X1GE AND 2X10GE UPLINKS, 350W DEFAULT PWR NO POE POWER, W/STACK POWER		1,675.00		1,675.00
VS-C3850-48P-L	LAN BASE, 48 POE+PORT, 4X1GE AND 2X10GE AND 4X10GE UPLINKS, 715W DEFAULT PWR 435 AVAILABLE POE POWER, W/ STACK POWER		2,625 00		2,625,00
VS-C3850-48PW-S	IP BASE, 48 POE PORT W/ 5 AP LICENSE		2,300.00	0	2,300,00

530 South Henderson Rd Suite A **Data** Direct

King Of Prussia, PA 19406-4211

Purchase Order

P.O. No. Date 11/2/2017 12013

Phone #

Fax#

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purchasingteam@dataqdirect.com

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Vendor

Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581

Ship To Seth Krawitz DataQDirect 530 South Henderson Road Suite A King Of Prussia PA 19406 sĸ Buyer

FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via
Origin	Cisco	NET 90	11/9/2017	11/16/2017	Will Call

(Hum)	Description	QHy	(Flate)	- MICKE	Amount
MICHEL AND A STATE OF THE STATE	Description IP BASE, 48 PORT, AXYGE AND 2XYGGE AND 4XYGGE UPLINKS, 36GW DEFAULT PAIR NO POE POWER, WESTACK POWER This Desilie her 3C "Product must be peth on pollets no haller than 1 Soom hall "Weights and dimens along with the shipping address must be given to datag in arran for it to be proped up This product will be shipped in DataG's Shipping account to DataG's warefulues "Cross the production of DataG's warefulues they become sellable proflects "DataG will give a Sales theyer every 2 weeks with what products have noted along with souther is also after to sell from this attack aswell and DataG will pack and blind article aswell and DataG will pack and blind	Gry Carlotte	2 2,400.00		Amount 4,800.00
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Data Direct

530 South Henderson Rd Suite A King Of Prussia, PA 19406-4211

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Date P.O. No.

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Seth Krawitz
DataQDirect
530 South Henderson Road
Suite A
King Of Prussia PA 19406

Buyer SK

,	FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via
	Origin	Cisco	NET 90	11/9/2017	11/16/2017	Will Call

Item.	Description	Qty	Rate	Rcv'd	Amount
	****THIS SHIPMENT MUST SHIP ON				7
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	HIGHER THAN 150CM TALL				
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	PROTECT THE PRODUCT ALONG WITH			*Addition of	
	BLACK SHRINK WRAP/STRETCHWRAP			- Olychronae	
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	PICKED UP BY DATAQ THE WEIGHTS AND DIMMENSIONS MUST BE PROVIDED			non-equipment	
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	HAVE THE CORRECT DECLARED VALUE		Silver and the second	0000	
	ON IT TO ENSURE NO CUSTOMS ISSUES/DELAYS/SEIZURES			90000	
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	CLEAN/UNREGISTERED OF ANY AFTER			1	
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3.5 St. 1000	AFTER THE PRODUCT HAS REACHED	STATISTICS.		1975	
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Suite A
Data Direct King Of Prussia, PA 19406-4211

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Date P.O. No. 11/2/2017 12013

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Net Innovate International PTE LTD Ashish Malhotra 16 Raffles Quay, #33-03 Hong Leong Building Singapore 048581

Fax#

Ship To

Seth Krawitz DataQDirect 530 South Henderson Road Suite A King Of Prussia PA 19406

Buyer

SK

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FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via
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Origin	Cisco	NET 90	11/9/2017	11/16/2017	Will Call

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530 South Henderson Rd Suite A King Of Prussia, PA 19406-4211

## Purchase Order

Date P.O. No.
11/2/2017 12013

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Vendor

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Buyer

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FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via	
Origin	Cisco	NET 90	11/9/2017	11/16/2017	Will Call	ì

ltem	Description	Qty	Rate	Rov'd	Amount
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	2. WE WILL NOT ACCEPT BOX DATES THAT ARE LATER THE MFG PART DATE			and the second s	
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	MANUFACTURE SEAL HAS NOT BEEN			J. date	
	BROKEN). 4. THE PRODUCT HAS NOT BEEN			BB-00-17	
	PREVIOUSLY COVERED UNDER AN				
	AFTER SALES SERVICE PROGRAM AND				
	WILL NOT BE COVERED IN THE FUTURE			2 5	
	WITHOUT OUR PRIOR AGREEMENT BY THE ORIGINAL SUPPLIER AND				
	DISTRIBUTION CHANNEL ORIGIN OF THE				
	PRODUCT. IN ADDITION THE PRODUCT				
	IS ELIGIBLE FOR FUTURE AFTER SALES				
		1	Tota	Y	

Data Direct

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FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via	
Origin	Cisco	NET 90	11/9/2017	11/16/2017	Will Call	

HYHIO THE SECTION IN THE	PROGRAMS SUCH AS SMARTNET/JOAR F FOR SOME REASON FOR UP TO 1 YEAR IF THE PRODUCT IS NOT ABLE TO BE COVERED UNDER AN AFTER SALES BERVICE CONTRACT, SELLER AGREES TO TAKE PRODUCT BACK FOR A FULL REFUND AND PAY ALL COSTS ASSOCIATED WITH THIS PROCESS.	Stellers in the stellers in th			
Y ESTERAS A UT THE	YEAR IF THE PRODUCT IS NOT ABLE TO BE COVERED UNDER AN AFTER SALES BERVICE CONTRACT, SELLER AGREES TO TAKE PRODUCT BACK FOR A FULL REFUND AND PAY ALL COSTS	3		PRODUCE PARTY STATE OF VIOLENCE AND A STATE OF VIOLEN	
	BE COVERED UNDER AN AFTER SALES BERVICE CONTRACT, SELLER AGREES TO TAKE PRODUCT BACK FOR A FULL REFUND AND PAY ALL COSTS	3	ASSESSED AND ACTUAL ACT	Commission of Assistance Commission of Commi	
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	HIPMENT IS RECEIVED BY DATAQ.				

Data Direct

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FOB	Product Type	Payment Method	Must Ship By	Expected ETA	Ship Via	A COLOR
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Origin	Cisco	NET 90	11/9/2017	11/16/2017	Will Call	

İlem	Description	Qty	Rate	Rcv'd	Amount
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Total

\$125,534.70

NOTE: Seller represents and warrants that the goods are authentic and lawfully obtained. Seller further represents and warrants that the goods were manufactured by the manufacturer indicated by the part number or description on this PO. Seller hereby submits to any background checks deemed necessary by Buyer. Seller represents and warrants that the Goods are new in the manufacturer's original sealed retail packaging and inregistered from any service contract unless specifically agreed to otherwise in writing by Buyer. Seller will include all necessary. American power cords, with each product shipped where applicable.

# Exhibit "C"



### **LUNDY BELDECOS & MILBY**

February 27, 2018

#### VIA REGULAR & CERTIFIED MAIL, RRR

DataQ Internet Equipment Corporation 530 South Henderson Road King of Prussia, PA 19406 JESSICA M. GULASH, ESQ.

JGULASH@LBMLAW.COM PHONE: (610) 668-0772 FAX: (610) 668-7481

RE: Net Innovate International Pte. Ltd.

Dear Sir or Madam:

Please be advised that I represent Net Innovate International Pte. Ltd. ("Net Innovate").

On July 14, 2017, DataQ Internet Equipment Corporation ("DataQ") issued Purchase Order No. 11836 to Net Innovate pursuant to which DataQ purchased goods in the total sum of \$103,724.00 (the "July P.O."). The goods were delivered to DataQ on July 24, 2017. Within 90 days of the delivery date, DataQ was required to either: (a) make payment in full for all goods purchased pursuant to the July P.O.; and/or (b) return any unsold goods to Net Innovate and has not paid the total amount due under the July P.O. To date, DataQ owes Net Innovate the total sum of \$20,000.00 for goods purchased pursuant to the July P.O.

On November 2, 2017, DataQ issued Purchase Order No. 12013 to Net Innovate pursuant to which DataQ purchased goods in the total sum of \$125,534.70 (the "November P.O."). Those goods were delivered to DataQ on November 14, 2017. Within 90 days of the delivery date, DataQ was required to either: (a) make payment in full for all goods purchased pursuant to the November P.O.; and/or (b) return any unsold goods to Net Innovate and has not paid the total amount due under the November P.O. To date, DataQ owes Net Innovate the total sum of \$125,534.70 for goods purchased pursuant to the November P.O.

Please be advised that if the total sum of \$145,534.70 is not paid to Net Innovate within ten (10) days from the date of this correspondence, Net Innovate will not hesitate to exercise all of its rights and remedies pursuant to the Purchase Orders and applicable law. This may include, but is not limited to, filing a lawsuit against DataQ.



Page 2 of 2

Should you wish to discuss this matter, please do not hesitate to contact me. As it is my hope that litigation will not be necessary, I look forward to receiving your payment.

Very truly yours,

JESSICA M. GULASH

JMG/

Copy to (via email): Anoop Abrol

Vijendra Gupta